

EXHIBIT A

1 Scott R. Mosko (State Bar No. 106070)
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6 Attorneys for Defendant
7 Pacific Northwest Software, Inc.
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10 UNITED STATES DISTRICT COURT
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12 NORTHERN DISTRICT OF CALIFORNIA

13 FACEBOOK, INC.

14 Plaintiff,

15 v.
16 CONNECTU LLC (now known as CONNECTU,
17 INC.), PACIFIC NORTHWEST SOFTWARE,
18 INC., WINSTON WILLIAMS, AND DOES 1-25,
19 Defendants.

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CASE NO. C 07-01389 RS

**DECLARATION OF JOHN TAVES IN
SUPPORT OF MOTION TO DISMISS
FOR LACK OF PERSONAL
JURISDICTION PURSUANT TO FED.
R. CIV. P. 12(B)(2)**

Date: May 2, 2007
Time: 9:30 a.m.
Courtroom: 4
Judge: Hon. Richard Seeborg

1 I, JOHN TAVES, declare

2 1. I am the President of Pacific Northwest Software, Inc. ("PNS") PNS was
3 incorporated in Washington State in 1998. PNS has a principal place of business in the State of
4 Washington;

5 2. PNS received a copy of the summons and the Amended Complaint in Washington;

6 3.. PNS does not maintain a registered agent for service in California;

7 4. PNS does not own, lease, possess or maintain any real or personal property in
8 California, and has not owned, leased, possessed or maintained any real or personal property in
9 California;

10 5. PNS does not own, lease or maintain an office, residence or place of business in
11 California, and has not owned, leased or maintained an office, or place of business in California;

12 6. PNS has not paid taxes of any kind in the state of California;

13 7. PNS does not maintain any bank or savings and loan accounts in California and has
14 not maintained any bank or savings and loan accounts in California;

15 8. PNS has not and does not derive substantial revenue from goods used or consumed in
16 California or services rendered in California;

17 9. PNS has signed perhaps one or fewer contracts regarding a California entity;

18 10. PNS does not presently nor has it ever maintained a telephone listing in California;

19 11. The vast majority, which I estimate at 98%, of PNS's revenues from its customers has
20 come from entities located outside of California;

21 12. In or about 2004, Co-Defendant ConnectU hired PNS to write software as it
22 concerned ConnectU's website. Software writer Winston Williams, then an employee of PNS, was
23 assigned to work on the ConnectU project. PNS invoiced ConnectU for the services performed by
24 Winston Williams as they concerned the ConnectU website. ConnectU paid PNS for these invoiced
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28 Doc. No. 460103

1 services. At all times, PNS understood that ConnectU and its principals were not located in
2 California.

3 I declare under penalty of perjury under the laws of the United States that the foregoing is
4 true and correct and that this declaration was executed on the 21st day of March, 2007 at Seattle,
5 Washington.

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7 /s/
8 John Taves
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1 Scott R. Mosko (State Bar No. 106070)
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6 Attorneys for Defendant
Winston Williams

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

12 | FACEBOOK, INC.

CASE NO. C 07-01389 RS

13 Plaintiff,

**DECLARATION OF WINSTON
WILLIAMS IN SUPPORT OF
MOTION TO DISMISS FOR LACK OF
PERSONAL JURISDICTION
PURSUANT TO FED. R. CIV. P.
12(B)(2)**

15 CONNECTU LLC (now known as CONNECTU,
16 INC.), PACIFIC NORTHWEST SOFTWARE,
INC., WINSTON WILLIAMS, AND DOES 1-25

Defendants.

Date: May 2, 2007
Time: 9:30 a.m.
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1 I, WINSTON WILLIAMS, declare

2 1. I am a resident and citizen of the state of Washington;

3 2. My domicile is Seattle, Washington;

4 3. I received a copy of the summons and the Amended Complaint in

5 Washington;

6 4. I do not maintain a registered agent for service in California;

7 5. I do not own, lease, possess or maintain any real or personal property in

8 California, and have not owned, leased, possessed or maintained any real or personal

9 property in California;

10 6. I do not own, lease or maintain an office, residence or place of business in

11 California, and I have not owned, leased or maintained an office, residence or place of

12 business in California;

13 7. I have never had an authorized agent or representative in California;

14 8. I do not and have not paid taxes of any kind in the state of California;

15 9. I do not maintain any bank or savings and loan accounts in California and

16 have not maintained any bank or savings and loan accounts in California;

17 10. I have never performed any service or sold any goods in California;

18 11. I have not and do not derive substantial revenue from goods used or

19 consumed in California or services rendered in California;

20 12. I do not engage in a business and have not engaged in business in the state

21 of California;

22 13. I have never recruited employees in California;

23 14. I have never signed any contracts in California;

24 15. I do not presently nor have I ever maintained a telephone listing in

25 California;

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28 Doc. No. 450149

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1 16. Any activity that concerned email addresses available on thefacebook.com
2 website in which I was involved was done pursuant to my employment with Pacific
3 Northwest Software, Inc.

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5 I declare under penalty of perjury under the laws of the United States that the
6 foregoing is true and correct and that this declaration was executed on the 21st day of
7 March, 2007 at Seattle, Washington.

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/s/
Winston Williams

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